

14. While Channel 269C2 impedes the allocation of Channel 268C1, an alternate upgrade is still available for WDJY. Channel 269C3 can be allotted to Trenton, Florida, with a site restriction of 10.2 kilometers west of the community at reference coordinates North Latitude 29° 36' 44" and West Longitude 82° 55' 18".<sup>7</sup> From this location a 3.16 mV/m contour will be delivered to Trenton. (See Exhibit #6 for a spacing study for Channel 269A at Trenton.) A C3 facility at Trenton would potentially provide service to 41,564 persons which is an increase of 11,059 persons over the number of persons served by a Class A facility.<sup>8</sup>

15. Therefore, Great South, in Option #1 requests the following changes in §73.202(b) of the rules:

**Quincy, Florida**

Present  
268C2

Proposed  
268C1

**Monticello, Florida**

Present  
270C3

Proposed  
289C3

**Perry, Florida**

Present  
288A

Proposed  
221A

- 7) Channel 269C3 at Trenton, Florida, has a clearance of 15.97 kilometers from the proposed Channel 268C1 reference site at Quincy, Florida, and a clearance of 8.05 kilometers from the Channel 268C1 reference site at Woodville, Florida. Further Channel 269C2 at Trenton, Florida, would potentially have provided service to only 45,424 persons.
- 8) WDJY, operating under BMLH-940418KB, provides service to 30,505 persons.

### **Springfield, Florida**

Present  
267A

Proposed  
266A

### **Apalachicola, Florida**

Present  
265A

Proposed  
263C3 or 263A

### **Trenton, Florida**

Present  
269C2

Proposed  
269A<sup>9</sup>

### **PUBLIC INTEREST ASPECTS**

16. The allocation of Channel 268C1 will enable WXSX to upgrade and allow for expanded service. WXSX operating as a C1 facility will provide 315,679 persons in 9,892.2 kilometers with service.<sup>10</sup> This represents an increase of 24,064 persons in 1,649.5 square kilometers over its presently licensed facility.<sup>11</sup> Further, the substitution of Channel 266A for Channel 267A at Springfield, Florida, will enable station WYOO to improve to a 6.0 kilowatt Class A facility.<sup>12</sup>

9) WOJY is presently licensed (and upgrading) on Channel 269A.

10) The WXSX facilities used for this comparison assume the use of the present WXSX transmitter site, operating under §73.215 of the Commission's rules, once the allocation of Channel 268C1 is made at Quincy, Florida. As such, WXSX could operate with 86.0 kilowatts at a height above average terrain of 143 meters.

11) Since no actual site relocation is proposed, no loss will result when Channel 268C1 is allocated to Quincy, Florida.

12) Presently WYOO is licensed to operate with 5.2 kilowatt at 72 meters HAAT. As a maximum 6.0 kilowatt 100 meter facility, WYOO could provide service to an additional 2,239 persons in 173.6 square kilometers over its currently licensed facility.

## OPTION #2

17. As an alternative to the above referenced Option #1, Great South proposes the allocation of Channel 268C1 to Woodville, Florida. The allocation of this channel is mutually exclusive with the present allocation of Channel 268C2 at Quincy, Florida, and the proposed allocation of Channel 268C2 at Woodville, Florida. Channel 268C1 can be allocated to Woodville at reference coordinates North Latitude 30° 03' 45" and West Longitude 84° 24' 28". This represents a site restriction of 31.8 kilometers south-southwest of the community to avoid shortspacing WHJX-FM, Channel 268C, Brunswick, Georgia.<sup>13</sup> From this location, a 3.16 mV/m contour will be delivered over Woodville, Florida. Exhibit #7 is a usable area study for Channel 268C1 at Woodville. Exhibit #8 is a \$73.207 spacing study for Channel 268C1 at Woodville. Both exhibits assume Channel 289C3 is substituted for Channel 270C3 at Monticello, Florida; Channel 266A is substituted for Channel 267A at Springfield, Florida; Channel 263C3 (or Channel 263A) is substituted for Channel 265A at Apalachicola, Florida; and the vacant and unapplied Channel 269C2 is deleted from Trenton, Florida. All of the substitutions noted above are the same as detailed in Option #1 (above).

13) The reference site for Woodville, Florida, is located outside the Apalachicola National Forest.

**Woodville, Florida**

Present  
None

Proposed  
268C1

**Quincy, Florida**

Present  
268C2

Proposed  
None<sup>14</sup>

**Monticello, Florida**

Present  
270C3

Proposed  
289C3

**Perry, Florida**

Present  
288A

Proposed  
221A

**Springfield, Florida**

Present  
267A

Proposed  
266A

**Apalachicola, Florida**

Present  
265A

Proposed  
263C3 or 263A

**Trenton, Florida**

Present  
269C2

Proposed  
269A<sup>15</sup>

14) Full time AM station WWSD 1230 kHz will remain licensed to Quincy, Florida.

15) See supra note 9.

### **PUBLIC INTEREST ASPECTS**

18. The allocation of Channel 268C1 to Woodville, Florida, will provide that community with its first locally licensed FM facility without depriving Quincy of its only full-time service. It will also enable WXSJ to upgrade and allow for expanded service. WXSJ operating as a C1 facility will provide 315,679 persons in 9,89.92 kilometers with service.<sup>16</sup> This represents an increase of 24,064 persons in 1,649.5 square kilometers over its presently licensed facility.<sup>17</sup> Further, the substitution of Channel 266A for Channel 267A at Springfield, Florida, will enable station WYOO to improve to a 6.0 kilowatt Class A facility.<sup>18</sup>

19. When Channel 268C1 is allocated to either Quincy or Woodville, Great South will file an application seeking to improve the facilities of WXSJ on the upgraded channel. Further, Great South states it will reimburse the licensee at Monticello, Perry, Springfield and, if necessary, Apalachicola for their reasonable expenses in making the proposed substitutions.

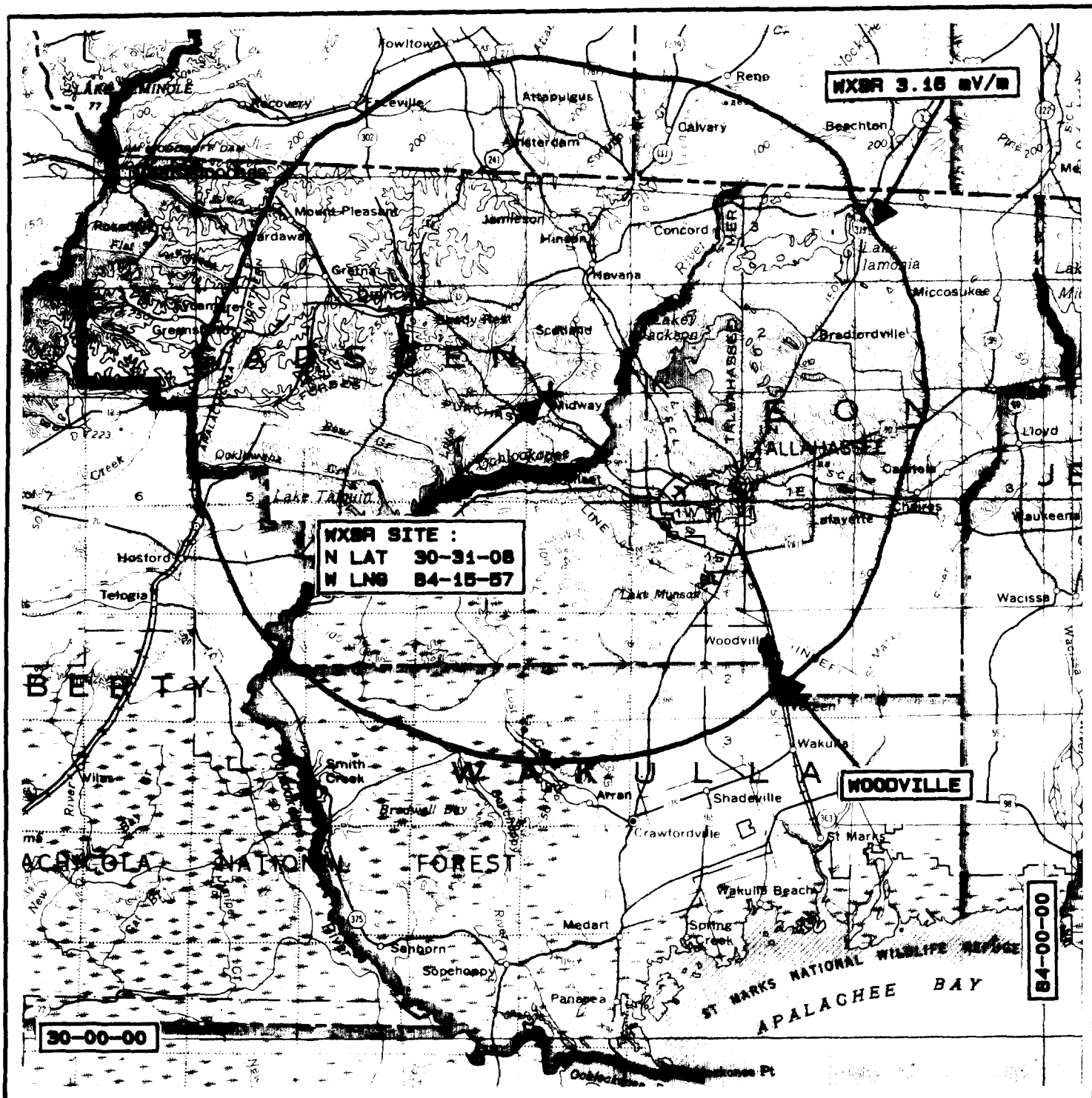
20. The foregoing was prepared on behalf of Great South Broadcasting, Inc., by Graham Brock, Inc., its Technical Consultants. All information contained herein is true and

16) See supra note 6.

17) See supra note 7.

18) See supra note 8.

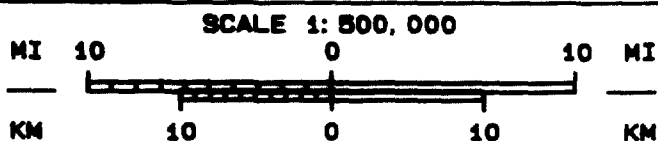
accurate to the best of our belief and knowledge. All data relating to FM facilities was extracted from the NTIA database, as updated June 30, 1995. We assume no liability for errors or omissions in that database which may be adverse to the requests contained herein.



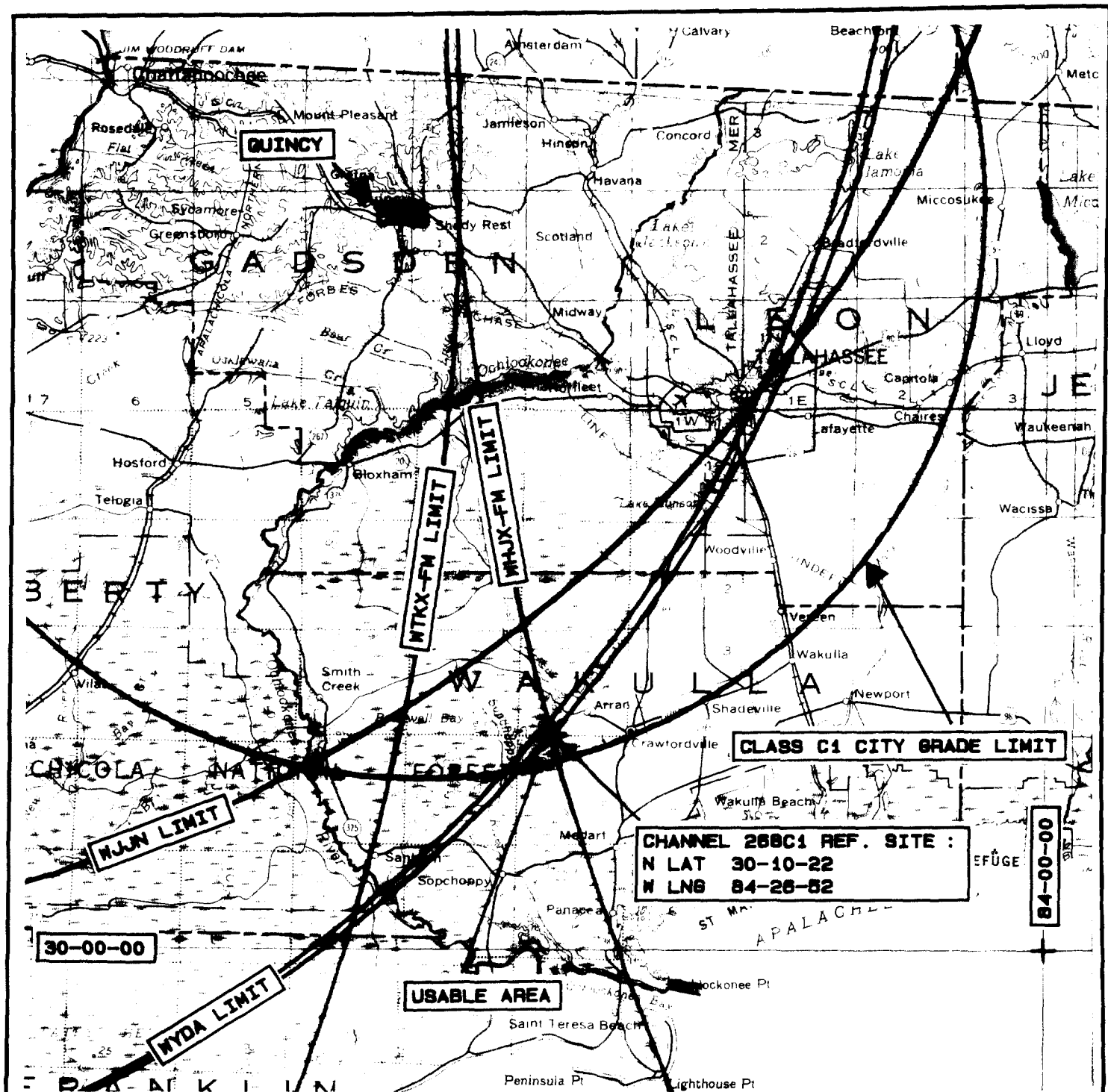
**3.16 mV/m COVERAGE OF WXS**

**MAP IS A PORTION OF THE 1: 500, 000 SCALE  
U.S.G.S. BASE MAP OF FLORIDA.**

**EXHIBIT #1**  
**COMMENTS & COUNTERPROPOSAL**  
**GREAT SOUTH BCG., INC.**  
**MM DOCKET # 95-82**  
**WXS RADIO STATION**  
**QUINCY/WOODVILLE, FLORIDA**  
**August 1995**

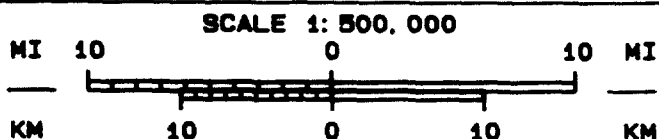


**GRAHAM BROCK, INC.**  
**BROADCAST TECHNICAL CONSULTANTS**



# CHANNEL 268C1 USABLE AREA

MAP IS A PORTION OF THE 1: 500, 000 SCALE  
U.S.G.S. BASE MAP OF FLORIDA.



## EXHIBIT #2

COMMENTS & COUNTERPROPOSAL  
GREAT SOUTH BCG., INC.  
MM DOCKET # 95-82  
WXSR RADIO STATION  
QUINCY/WOODVILLE, FLORIDA  
August 1995

**GRAHAM BROCK, INC.**

BROADCAST TECHNICAL CONSULTANTS



ALLOCATION STUDY FOR CHANNEL 268C1 QUINCY, FLORIDA  
USING PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE	CLASS C1	DISPLAY DATES
30 10 22 N	Current rules spacings	DATA 06-30-95
84 26 52 W	CHANNEL 268 -101.5 MHz	SEARCH 08-03-95

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
AD268 AD	268C2 30 18 53	Woodville 84 15 57	FL 0.000 kW	47.9 OM	23.54 14.6	224.0 139.2	-200.46
Great South Broadcasting, Inc. RM8630 950406							
>PRM-Site Restricted 1.7 km West-Change of Community							
WXSX LI CN	268C2 30 31 08	Quincy 84 27 04	FL 50.000 kW	359.5 145M	38.37 23.9	224.0 139.2	-185.63
Great South Broadcasting, Inc. BLH-901016KB							
1 WYOO LI ZCN	267A 30 12 12	Springfield 85 36 57	FL 5.200 kW	272.0 72M	112.54 69.9	133.0 82.7	-20.46
Randall R. Wahlberg BLH-930308KD							
2 WJPH.C CP ZCN	270C3 30 26 52	Monticello 83 52 39	FL 25.000 kW	60.7 100M	62.75 39.0	76.0 47.2	-13.25
Mayflower Broadcasting Corp. BPH-930616IG 950903							
>from Channel 270A Per MM Docket #92-232							
2 DE270 DE	270C3 30 26 52	Monticello 83 52 39	FL 0.000 kW	60.7 OM	62.75 39.0	76.0 47.2	-13.25
Great South Broadcasting, Inc. RM-8630 950406							
3 ALOPEN AL N	269C2 29 35 00	Trenton 83 05 50	FL 0.000 kW	116.4 OM	145.92 90.7	158.0 98.2	-12.08
>Site Restricted-Reserved for WDJY per MM Docket #93-118							
4 WOYS LI CN	265A 29 43 57	Apalachicola 84 53 24	FL 5.400 kW	221.1 105M	64.84 40.3	75.0 46.6	-10.16
Richard L. Plessinger, Sr. BMLH-891205KC							
>to Channel 263C3 per One-Step Application BPH-940617IZ							
3 WJPH LI CN	270A 30 31 58	Monticello 83 52 17	FL 6.000 kW	54.0 76M	68.29 42.4	75.0 46.6	-6.71
Mayflower Broadcasting Corp. BMLH-910319KE							
WYDA.A AP CN	269A 30 57 21	Graceville 85 29 53	FL 6.000 kW	311.2 100M	133.00 82.7	133.0 82.7	0.00
Lina M. Parish BMPH-950505ID							
WHJXFM LI CN	268C 30 49 17	Brunswick 81 44 13	GA 100.000 kW	73.8 446M	270.00 167.8	270.0 167.8	0.00
George R. Reed, Receiver BLH-890707KD							
WYDA.C CPM CN	269A 30 57 11	Graceville 85 30 50	FL 6.000 kW	310.6 98M	133.95 83.3	133.0 82.7	0.95
Lina M. Parish BMPH-940414IB 950514							

**CHANNEL 268C1 ALLOCATION STUDY**

- #1 - WYOO TO BE RELOCATED TO CHANNEL 268A.
- #2 - CHANNEL 269C3 TO BE SUBSTITUTED FOR CHANNEL 270C3 AT MONTICELLO, FLORIDA.
- #3 - CHANNEL 269C2 TO BE DOWNGRADED. SEE TEXT FOR DETAILS.
- #4 - WOYS TO CHANGE TO CHANNEL 263C3.

**EXHIBIT #3**

**COMMENTS & COUNTERPROPOSAL  
GREAT SOUTH BCG., INC.  
MM DOCKET # 95-82  
WXSX RADIO STATION  
QUINCY/WOODVILLE, FLORIDA  
August 1995**

**GRAHAM BROCK, INC.**

BROADCAST TECHNICAL CONSULTANTS

ALLOCATION STUDY FOR CHANNEL 266A SPRINGFIELD, FLORIDA  
USING PRESENT WYOO SITE AS REFERENCE

REFERENCE	CLASS A	DISPLAY DATES
30 12 12 N	Current rules spacings	DATA 06-30-95
85 36 57 W	CHANNEL 266 -101.1 MHz	SEARCH 08-03-95

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR/ HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
WYOO	267A	Springfield	FL	0.0	0.00	72.0	-72.00
LI ZCN	30 12 12	85 36 57	5.200 kw	72M	0.0	44.8	
		Randall R. Wahlberg			BLH-930308KD		
WJAO	265A	Marianna	FL	28.1	73.06	72.0	1.06
LI HN	30 47 01	85 15 18	5.900 kw	101M	45.4	44.8	
		Brewer Broadcasting Corporation			BMLH-941123KG		
WOYS	265A	Apalachicola	FL	126.6	87.36	72.0	15.36
LI CN	29 43 57	84 53 24	5.400 kw	105M	54.3	44.8	
		Richard L. Plessinger, Sr.			BMLH-891205KC		
		>to Channel 263C3 per One-Step Application BPH-940617IZ					
WZTZ	266A	Elba	AL	346.4	137.89	115.0	22.89
LI CN	31 24 41	85 57 32	0.640 kw	208M	85.7	71.5	
		Elba Radio Company			BLH-861010KA		
WAFT	266C1	Valdosta	GA	70.4	225.43	200.0	25.43
LI CN	30 51 50	83 23 39	100.000 kw	170M	140.1	124.3	
		Christian Radio Fellowship, Inc.			BLH-880205KC		
WJUN	267A	Dothan	AL	13.5	113.74	72.0	41.74
LI CN	31 12 02	85 20 12	3.000 kw	100M	70.7	44.8	
		James Wilson, III			BLH-910613KC		
WJUN.A	267A	Dothan	AL	13.6	113.85	72.0	41.85
AP CN	31 12 04	85 20 04	1.150 kw	163M	70.8	44.8	
		James Wilson, III			BPH-940923IF		
		>Amended 950221					
WOYS.A	263C3	Apalachicola	FL	126.6	87.36	42.0	45.36
AP CN	29 43 57	84 53 24	10.000 kw	110M	54.3	26.1	
		Richard L. Plessinger, Sr.			BPH-940617IZ		
		>One-Step Application From Channel 265A					
ALOPEN	263C3	Apalachicola	FL	126.6	87.36	42.0	45.36
AL N	29 43 57	84 53 24	0.000 kw	0M	54.3	26.1	
		>Reserved for WOYS per One-Step Application BPH-940617IZ					

CHANNEL 266A ALLOCATION STUDY

**EXHIBIT #4**  
**COMMENTS & COUNTERPROPOSAL**  
**GREAT SOUTH BCG., INC.**  
**MM DOCKET # 95-82**  
**WXSR RADIO STATION**  
**QUINCY/WOODVILLE, FLORIDA**  
**August 1995**

**GRAHAM BROCK, INC.**

BROADCAST TECHNICAL CONSULTANTS

ALLOCATION STUDY FOR CHANNEL 263A APALACHICOLA, FLORIDA  
USING PRESENT WOYS SITE AS REFERENCE

REFERENCE	CLASS A	DISPLAY DATES
29 43 57 N	Current rules spacings	DATA 06-30-95
84 53 24 W	CHANNEL 263 -100.5 MHz	SEARCH 08-03-95

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
-----							
ALOPEN 263C3	Apalachicola	FL	0.0	0.00	142.0	-142.00	
AL N	29 43 57	84 53 24	0.000 kW	OM	0.0	88.3	
>Reserved for WOYS per One-Step Application BPH-940617IZ							
WOYS.A 263C3	Apalachicola	FL	0.0	0.00	142.0	-142.00	
AP CN	29 43 57	84 53 24	10.000 kW	110M	0.0	88.3	
Richard L. Plessinger, Sr.					BPH-940617IZ		
>One-Step Application From Channel 265A							
WOYS 265A	Apalachicola	FL	0.0	0.00	31.0	-31.00	
LI CN	29 43 57	84 53 24	5.400 kW	105M	0.0	19.3	
Richard L. Plessinger, Sr.					BMLR-891205KC		
>to Channel 263C3 per One-Step Application BPH-940617IZ							
ALOPEN 264C3	Midway	FL	29.2	102.76	89.0	13.76	
AL	30 32 22	84 21 54	0.000 kW	OM	63.9	55.3	
> Reserved for WTPS Quincy, Florida per MM Docket # 93-229							
WTPS.C 264A	Quincy	FL	25.7	94.46	72.0	22.46	
CP CN	30 29 55	84 27 39	6.000 kW	100M	58.7	44.8	
Leah R. James & John L. James					BPH-931027IB 951006		
> to Channel 264C3 Midway, Florida per MM Docket #93-229							
WTPS.C 264A	Quincy	FL	20.4	94.98	72.0	22.98	
CP CN	30 32 05	84 32 37	3.000 kW	100M	59.0	44.8	
Leah R. James & John L. James					BPH-870227ME 930929		
> to Channel 264C3 Midway, Florida per MM Docket #93-229							
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CHANNEL 263A ALLOCATION STUDY

**EXHIBIT #5**  
**COMMENTS & COUNTERPROPOSAL**  
**GREAT SOUTH BCG., INC.**  
**MM DOCKET # 95-82**  
**WXSR RADIO STATION**  
**QUINCY/WOODVILLE, FLORIDA**  
**August 1995**

**GRAHAM BROCK, INC.**

BROADCAST TECHNICAL CONSULTANTS

ALLOCATION STUDY FOR TRENTON, FLORIDA  
USING PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE	CLASS C3	DISPLAY DATES
29 36 44 N	Current rules spacings	DATA 06-30-95
82 55 18 W	CHANNEL 269 -101.7 MHz	SEARCH 08-09-95

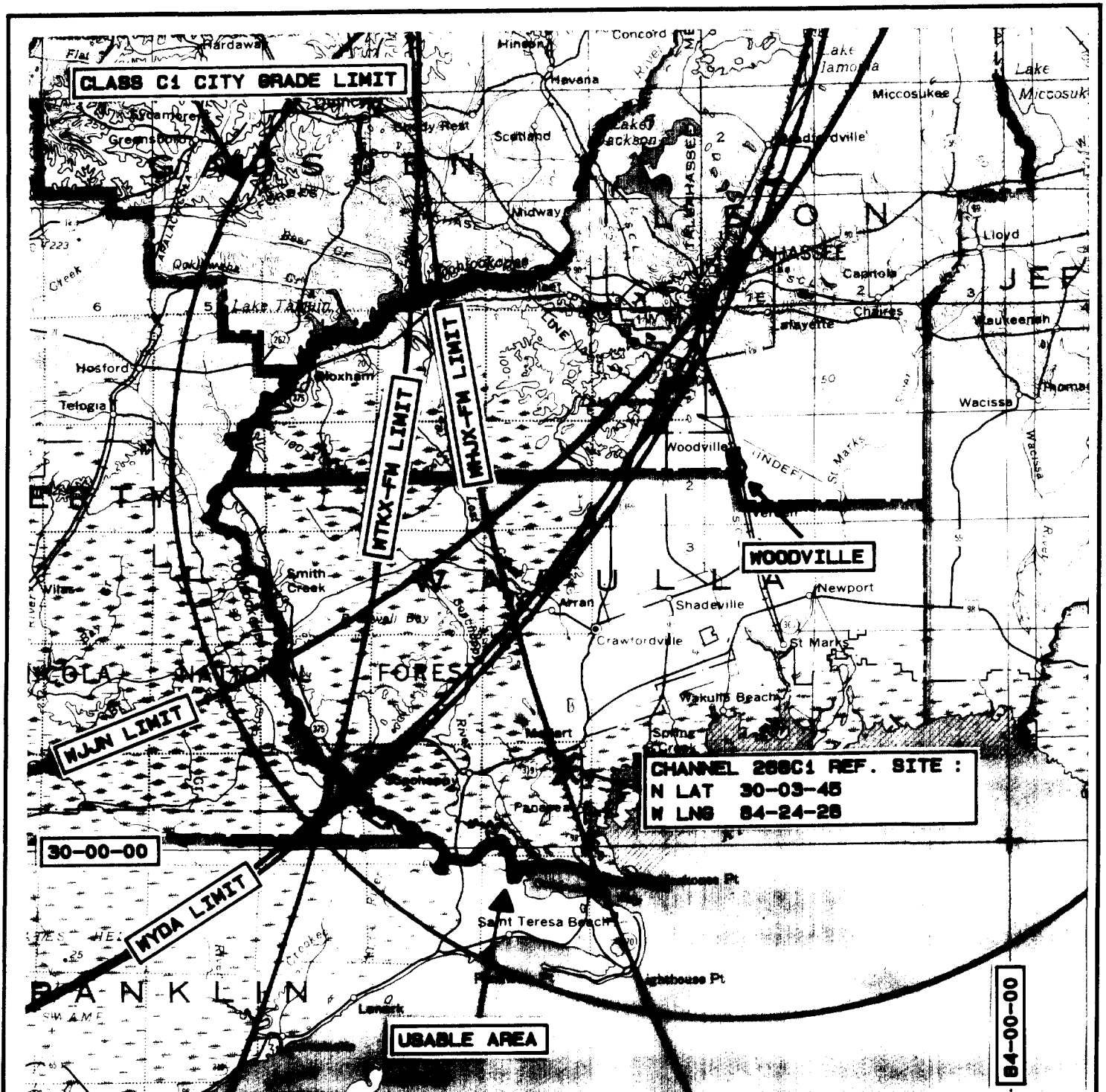
CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)
ALOPEN	269C2	Trenton	FL	259.3	17.31	177.0	-159.69
AL	N 29 35 00	83 05 50	0.000 kW	0M	10.8	110.0	
>Reserved for WDJY per MM Docket #93-118							
WDJY.A	269A	Trenton	FL	91.1	6.57	142.0	-135.43
AP	CN 29 36 40	82 51 14	6.000 kW	100M	4.1	88.3	
Florida Radio Partners, Inc. BMLH-940418KB							
>to Channel 269C2 per MM Docket #93-118							
WDJY	269A	Trenton	FL	91.1	6.57	142.0	-135.43
LI	CN 29 36 40	82 51 14	3.000 kW	100M	4.1	88.3	
Florida Radio Partners, Inc. BLH-880307KD							
>to Channel 269C2 per MM Docket #93-118							
WHJXFM	268C	Brunswick	GA	40.0	176.00	176.0	0.00
LI	CN 30 49 17	81 44 13	100.000 kW	446M	109.4	109.4	
George R. Reed, Receiver BLH-890707KD							
WFEZ	267A	Williston	FL	120.9	42.03	42.0	0.03
LI	CN 29 25 04	82 32 58	3.500 kW	132M	26.1	26.1	
Bogie Broadcasting Company, Inc. BMLH-930216KD							
AD268	268C1	Woodville	FL	289.6	152.05	144.0	8.05
AD	30 03 45	84 24 28	0.000 kW	0M	94.5	89.5	
Great South Broadcaasting, Inc.							
>Counterproposal MM Docket #95-82							
WTRFSM	272C2	Dunnellon	FL	132.6	69.53	56.0	13.53
LI	CN 29 11 16	82 23 39	50.000 kW	149M	43.2	34.8	
Asterisk Communications, Inc. BLH-890705KB							
WJHM.C	270C1	Daytona Beach	FL	115.9	158.70	144.0	14.70
CP	CN 28 58 55	81 27 18	45.000 kW	415M	98.6	89.5	
Augusta Broadcaster, Inc. BPH-950410ID 961103							
AD268	268C1	Quincy	FL	293.3	159.97	144.0	15.97
AD	30 03 45	84 24 28	0.000 kW	0M	99.4	89.5	
Great South Broadcaasting, Inc.							
>Counterproposal MM Docket # 95-82							
WQLC	271C3	Watertown	FL	9.2	69.70	43.0	26.70
LI	CN 30 13 58	82 48 18	9.000 kW	162M	43.3	26.7	
Louis D. Bolton, II BLH-920818KB							
WJHM	270C1	Daytona Beach	FL	115.9	173.56	144.0	29.56
LI	CN 28 55 16	81 19 09	28.000 kW	483M	107.9	89.5	
Augusta Broadcaster, Inc. BLH-870601KC							

CHANNEL 269C3 ALLOCATION STUDY

EXHIBIT #6

COMMENTS & COUNTERPROPOSAL  
GREAT SOUTH BCG., INC.  
MM DOCKET # 95-82  
WXSR RADIO STATION  
QUINCY/WOODVILLE, FLORIDA  
August 1995

**GRAHAM BROCK, INC.**  
BROADCAST TECHNICAL CONSULTANTS



# CHANNEL 268C1 USABLE AREA

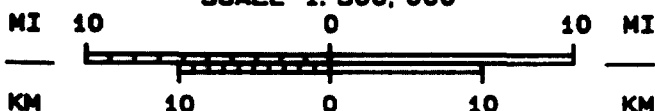
MAP IS A PORTION OF THE 1: 500, 000 SCALE  
U.S.G.S. BASE MAP OF FLORIDA.

EXHIBIT #7  
COMMENTS & COUNTERPROPOSAL  
GREAT SOUTH BCG., INC.  
MM DOCKET # 95-82  
WXSR RADIO STATION  
QUINCY/WOODVILLE, FLORIDA  
August 1995

## Graham Brock, Inc.

BROADCAST TECHNICAL CONSULTANTS

SCALE 1: 500, 000



ALLOCATION STUDY FOR CHANNEL 268C1 WOODVILLE, FLORIDA  
USING PROPOSED ALLOCATION SITE AS REFERENCE

REFERENCE	CLASS C1	DISPLAY DATES
30 03 45 N	Current rules spacings	DATA 06-30-95
84 24 28 W	CHANNEL 268 -101.5 MHz	SEARCH 08-03-95

CALL TYPE	CH# LAT	CITY LNG	STATE PWR	BEAR' HT	D-KM D-Mi	R-KM R-Mi	MARGIN (KM)	
AD268	268C2	Woodville	FL	25.9	31.12	224.0	-192.88	
AD	30 18 53	84 15 57	0.000 kW	OM	19.3	139.2		
	Great South Broadcasting, Inc.				RM8630	950406		
>PRM-Site Restricted 1.7 km West-Change of Community								
WXHR	268C2	Quincy	FL	355.3	50.76	224.0	-173.24	
LI CN	30 31 08	84 27 04	50.000 kW	145M	31.5	139.2		
	Great South Broadcasting, Inc.				BLH-901016KB			
1	ALOPEN	269C2	Trenton	FL	112.5	137.36	158.0	-20.64
	AL N	29 35 00	83 05 50	0.000 kW	OM	85.4	98.2	
	>Site Restricted--Reserved for WDJY per MM Docket #93-118							
2	WOYS	265A	Apalachicola	FL	231.8	59.22	75.0	-15.78
	LI CN	29 43 57	84 53 24	5.400 kW	105M	36.8	46.6	
	Richard L. Plessinger, Sr.				BMLH-891205KC			
	>to Channel 263C3 per One-Step Application BPH-940617IZ							
3	WYOO	267A	Springfield	FL	278.0	117.45	133.0	-15.55
	LI ZCN	30 12 12	85 36 57	5.200 kW	72M	73.0	82.7	
	Randall R. Wahlberg				BLH-930308KD			
4	DE270	270C3	Monticello	FL	49.8	66.55	76.0	-9.45
	DE	30 26 52	83 52 39	0.000 kW	OM	41.4	47.2	
	Great South Broadcasting, Inc.				RM-8630	950406		
4	WJPH.C	270C3	Monticello	FL	49.8	66.55	76.0	-9.45
	CP ZCN	30 26 52	83 52 39	25.000 kW	100M	41.4	47.2	
	Mayflower Broadcasting Corp.				BPH-930616IG	950903		
	>from Channel 270A per MM Docket #92-232							
4	WJPH	270A	Monticello	FL	44.4	73.35	75.0	-1.65
	LI CN	30 31 58	83 52 17	6.000 kW	76M	45.6	46.6	
	Mayflower Broadcasting Corp.				BMLH-910319KE			
	>to Channel 270C3 per MM Docket #92-232							
	WHJXFM	268C	Brunswick	GA	71.1	270.00	270.0	0.00
	LI CN	30 49 17	81 44 13	100.000 kW	446M	167.8	167.8	
	George R. Reed, Receiver				BLH-890707KD			
	WYDA.A	269A	Graceville	FL	313.8	144.09	133.0	11.09
	AP CN	30 57 21	85 29 53	6.000 kW	100M	89.6	82.7	
	Lina M. Parish				BMPH-950505ID			
	WYDA.C	269A	Graceville	FL	313.3	144.98	133.0	11.98
	CPM CN	30 57 11	85 30 50	6.000 kW	98M	90.1	82.7	
	Lina M. Parish				BMPH-940414IB	950514		

**CHANNEL 268C1 ALLOCATION STUDY**

- #1 - CHANNEL 269C2 TO BE DOWNGRADED. SEE TEXT FOR DETAILS.
- #2 - WOYS TO CHANGE TO CHANNEL 263C3.
- #3 - WYOO TO CHANGE TO CHANNEL 268A.
- #4 - CHANNEL 269C3 TO BE SUBSTITUTED FOR CHANNEL 270C3 AT MONTICELLO, FLORIDA.

**EXHIBIT #8**

**COMMENTS & COUNTERPROPOSAL  
GREAT SOUTH BCG., INC.  
MM DOCKET # 95-82  
WXHR RADIO STATION  
QUINCY/WOODVILLE, FLORIDA  
August 1995**

**GRAHAM BROCK, INC.**

BROADCAST TECHNICAL CONSULTANTS

**AFFIDAVIT AND QUALIFICATIONS OF CONSULTANT**

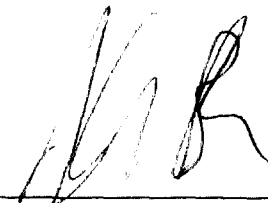
State of Georgia    )  
St. Simons Island    ) ss:  
County of Glynn    )

**JEFFERSON G. BROCK**, being duly sworn, deposes and says that he is an officer of Graham Brock, Inc. Graham Brock has been engaged by Great South Broadcasting, Inc., licensee of Radio Station WXSX, to prepare the attached Technical Exhibit.


His qualifications are a matter of record before the Federal Communications Commission. He has been active in Broadcast Engineering since 1979

The attached report was either prepared by him or under his direction and all material and exhibits attached hereto are believed to be true and correct.

*This the 9th day of August, 1995.*

  
\_\_\_\_\_  
Jefferson G. Brock  
Affiant

*Sworn to and subscribed before me  
this the 9th day of August, 1995*

  
\_\_\_\_\_  
Notary Public, State of Georgia  
My Commission Expires: September 8, 1995

**EXHIBIT 2**





DUPLICATE

# W. B. Grimes & Company

Established 1959

Larry Grimes - President

P. O. Box 442 • Clarksburg, MD 20871 • (301) 540-0636

Regional Offices:

Cambridge, MA  
Clarksdale, MS  
Milwaukee, WI  
Washington, D.C.  
St. Thomas, Ontario

March 2, 1995

Mr. Dennis Williams  
Chief, FM Branch  
Federal Communications Commission  
1919 M Street, NW, Room 332  
Washington, D.C. 20554

Dear Mr. Williams:

BRI H-9410413KB

On behalf of Florida Radio Partners, Inc. (FRPI), licensee of FM broadcast station WDJY (formerly WCWB) at Trenton, Florida, it is requested that the time for FRPI to file an application to upgrade to a Class C2 facility be extended to September 15, 1995. Anti-Drug Abuse Certification is attached.

By Report and Order in MM Docket No. 93-118, DA 92-883 (released August 23, 1993), the Commission substituted Channel 269C2 for Channel 269A at Trenton, Florida. Pursuant to an assignment by the Commission, FRPI became the licensee of WCWB (FM) on November 9, 1993. Since that time, FRPI has been busy assuming control of the station, and making the technological improvements necessary to improve the quality of the signal to be competitive in its market. Since the upgrade requires a change of transmitter site, FRPI has also been actively engaged in the search for a suitable site. To date, we have surveyed several potential locations, all of which have wetlands or zoning constraints. We continue to diligently search for a suitable site and believe we will be successful within the next 180 days.

Accordingly, FRPI requests that the deadline to file an application for a construction permit to upgrade to Channel 269C2 be extended to September 15, 1995.

Respectfully submitted,

  
Larry Grimes  
President  
Florida Radio Partners, Inc.

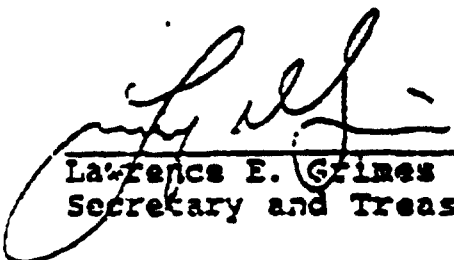
RECEIVED

MAR 17 1995

FM EXAMINERS

**ANTI-DRUG ABUSE ACT CERTIFICATION**

This is to certify that no officer, director, or stockholder in Florida Radio Partners, Inc. is subject to a denial of federal benefits pursuant to Section 5301 of the Anti-Drug Abuse Act of 1988.



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Lawrence E. Grimes  
Secretary and Treasurer

DATE: April 8, 1994



3/2/95

**EXHIBIT 3**

239

FEDERAL COMMUNICATIONS COMMISSION  
WASHINGTON, DC 20554

9 JUN 1993

IN REPLY REFER TO:  
1800B3-BFM

Certified Mail --Return Receipt Requested

Angelina Broadcasting Corporation  
Radio Station KAQU(FM)  
408 Janeway  
Lufkin, TX 75901

Re: KAQU(FM), Huntington, TX  
Angelina Broadcasting  
Corporation  
Upgrade to Class C2

Dear Licensee:

Pursuant to the Report and Order in MM Docket 89-242, 6 FCC Rcd 3735, 56 Fed. Reg. 30512, released June 27, 1991 and effective August 12, 1991, the Commission modified the allotment for KAQU(FM) to permit that station to specify Class C2 facilities on the present channel [270]. Channel 270A was deleted from the Table of Allotments (47 C.F.R. § 73.202), and Channel 270C2 was substituted therein. KAQU(FM) was afforded a period of 90 days from the August 12, 1991 effective date to file a construction permit application on FCC Form 301 for Class C2 facilities. Although the old Class A allotment was deleted, KAQU(FM) was permitted to continue operating as previously authorized pending grant of a Class C2 construction permit and the implementation of the Class C2 operation.

However, as of this date, no construction permit application on FCC Form 301 for Class C2 facilities has been received.<sup>1</sup> A Class C2 station, being larger than a Class A station, requires greater protection from encroachment by other stations. Thus, KAQU(FM) is presently receiving the benefit of Class C2 protection while only providing the service of a Class A station. Failure to implement Class C2 facilities in a timely manner constitutes "warehousing" of unused spectrum to the preclusion of other potential users seeking to provide additional broadcast service to the public. Thus, your unfilled Class C2 allotment could result in your being made a party to

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<sup>1</sup> As a Class C2 station, KAQU(FM) is fully spaced under 47 C.F.R. § 73.207 of the Commission's rules at its presently licensed transmitter site. To preserve Class C2 facilities, KAQU(FM) would need to specify an effective radiated power (ERP) between 25.5 kW and 50 kW, assuming that the antenna height above average terrain (HAAT) remains at 100 meters. Alternatively, KAQU(FM) could request to be downgraded to Class C3 facilities and specify an ERP between 6.1 kilowatts and 25.0 kilowatts (for a HAAT of 100 meters or less) in the Form 301 application, or request Class A operation with an ERP between the licensed ERP of 3.0 kW and 6.0 kW.

an allocation rulemaking seeking to downgrade the Channel 270 Huntington, TX allotment.

Please note that, if you intend to apply for Class C2 facilities, you must submit a construction permit application on FCC Form 301.<sup>2</sup> If this application is filed before any conflicting rulemaking is initiated, the application will take precedence. If filed later, the application will be subject to the outcome of the rulemaking proceeding. Report and Order, Docket 91-348, 7 FCC Rcd 4917, 57 Fed. Reg. 36018, released August 4, 1992. If you do not intend to apply for Class C2 or Class C3 facilities and wish to remain as a Class A station (with the facilities unchanged from those presently licensed), you must submit an application on FCC Form 302-FM to modify KAQU(FM)'s license and include a statement specifically requesting that the Huntington, TX Channel 270 allotment be DOWNGRADED to Class A status.<sup>3</sup> Once downgraded, any future attempt to upgrade the Huntington, TX Channel 270 allotment will require a new Petition for Rulemaking. Forms 301, 302-FM, 155 (the Fee Form to accompany the Form 301), and the Mass Media Services Fee Filing Guide can all be obtained from the Commission at (202)-632-3676. It is suggested that a copy of this letter be attached to any filing to insure proper processing.

Sincerely,



Dennis Williams  
Chief, FM Branch  
Audio Services Division  
Mass Media Bureau

cc: David Oxenford  
Cantrell Broadcasting, Inc.

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<sup>2</sup> Because the rulemaking to upgrade KAQU(FM) to Class C2 [Docket 89-242] commenced prior the May 21, 1990, KAQU(FM) is required only to file the minor change application fee with the FCC Form 301 application, and need not submit the rulemaking fee. See Fee Collection Program, Gen. Docket 86-285, 5 FCC Rcd 3558, 55 Fed. reg. 19148 (1990).

<sup>3</sup> No filing fee is required for this Form 302-FM modification-of-license application.

## CERTIFICATE OF SERVICE

I, Denise Felice, a secretary in the law firm of Smithwick & Belendiuk, P.C., certify that on this 10th day of August, 1995, copies of the foregoing were mailed via first class mail, postage pre-paid, to the following:

Ms. Nancy J. Walls (\*)  
Allocations Branch  
Federal Communications Commission  
2000 M Street, N.W.  
Fifth Floor  
Washington, DC 20554

Webster Broadcasting, Inc.  
400 North Michigan Avenue  
#200  
Chicago, Illinois 60611  
[Radio Station WJPH(FM)]

Joseph E. Doyle, Esq.  
Jenner & Block  
One IBM Plaza  
Chicago, Illinois 60611  
[Counsel for WJPH(FM)]

RAHU Broadcasting, Inc.  
P.O. Box 779  
Perry, Florida 32347  
[Radio Station WNFK(FM)]

Florida Radio Partners, Inc.  
P.O. Box 442  
Clarksburg, MD 20871  
[Radio Station WDJY(FM)]

John S. Neely, Esq.  
Miller & Miller, P.C.  
1990 M Street, N.W.  
Suite 760  
Washington, DC 20036  
[Counsel for WOYS(FM)]

Richard J. Hayes, Jr., Esq.  
Law Offices of Richard J. Hayes, Jr.  
13809 Black Meadow Road  
Spotsylvania, VA 22553  
[Counsel for WYOO(FM)]

(\*): By Hand Delivery

  
Denise Felice